

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Emily Doe,

Plaintiffs,

vs.

American University of Antigua Inc.,

Defendant.

C.A. No. 4:20-cv-04445-JD

**CONSENT MOTION  
FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.01 (DSC), Defendant American University of Antigua Inc. (“Defendant”), by and through undersigned counsel, hereby moves this Court for a fourteen (14) day extension of time, to run from the date of filing of the instant motion, within which Defendant may respond to Plaintiff Emily Doe’s (“Plaintiff”) Motion to Proceed Using a Pseudonym. (Dkt. No. 5).

In accordance with Local Rule 7.02 (DSC), Defendant’s counsel conferred with counsel for Plaintiff, and Plaintiff does not object to the requested enlargement of time. Defendant submits that good cause exists for the extension sought for the reasons set forth herein.

Plaintiff’s Complaint was filed on December 23, 2020 (Dkt. No. 1) and the Motion to Proceed Using a Pseudonym (the “Motion”) was filed on December 28, 2020 (Dkt. No. 5).

Counsel for Defendant signed a waiver of service on January 11, 2021, which was filed with this Court on January 12, 2021. (Dkt. No. 6). Defendant’s counsel entered a Notice of Appearance in this matter on January 13, 2021. (Dkt. No. 8).

The filing deadline for Defendant to respond to Plaintiff’s Motion expired on January 11, 2021, the same date on which undersigned counsel signed the waiver of service and a date by

which counsel for Defendant had not yet entered an appearance. In other words, the deadline for Defendant to respond to the Motion expired on the same day undersigned counsel accepted service. Defendant's deadline to respond has not been previously extended and there is no operative Scheduling Order in this case, thus no other deadlines would be affected by granting the requested extension of time.

Accordingly, for the reasons set forth herein, Defendant respectfully requests the opportunity to respond to the Plaintiff's Motion to Proceed Using a Pseudonym (Dkt. No. 5), and seeks a fourteen (14) day enlargement of time, to run from the date of the instant filing, resulting in a new response filing deadline of **February 4, 2021**.

Respectfully submitted,

/s/ Angus H. Macaulay

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January 21, 2021  
Columbia, South Carolina